

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:
Frank R. Skrajny : Case No.19-20606 JAD
Janet E. Owad-Skrajny : Chapter 13
Debtor(s) :
Janet E. Owad-Skrajny :
Movant(s) : Related to Document #37
vs. : Hearing Date:5/29/2019
Amazon, America Express, Amex, :
Bank of America, Capital One, Cavalry :
Investments, Chasse Bank, Citi, :
Comenity Bank, Costco, Navient, :
Duquesne Light, Embrace Loans, King :
Size, Kohls, LVNV Funding, Merrick :
Bank, Nissan Motor Acceptance, One :
Main Financial, PNC Bank, PRA :
Receivables, PA Dept. of Revenue, :
Peoples Natural Gas, Quantum3 Group,:
Roundpoint Mortgage, Sears, Synchrony:
Bank, TD Bank, Target, and Ronda J :
Winnecour, Trustee :
Respondent(s) :

TRUSTEE'S RESPONSE TO APPLICATION FOR APPROVAL TO ALLOW
DEBTOR TO OBTAIN CREDIT CARD FOR WORK-RELATED TRAVEL
EXPENSES

Ronda J. Winnecour, Chapter 13 Trustee, by her undersigned counsel,
respectfully represents the following:

1. The Debtors request approval to obtain a credit card for work-related travel expenses.
2. The Trustee objects on the basis that the use of credit cards was at least a contributing cause of the filing of her bankruptcy case. The amount of credit card debt listed in the Debtors' Schedules totals \$80,010.30.
3. If the Debtors' Motion is granted, the Trustee requests that they be required to file monthly reports setting out the monthly charges, the monthly payments on

the credit card, the reimbursement checks from Debtor's employer, and whether there are any unreimbursed charges on the credit card.

WHEREFORE, the Trustee respectfully requests that the Motion be denied.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: 05/14/19

by /s/ Jana S. Pail
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CERTIFICATE OF SERVICE

I hereby certify that on the 14TH of May 2019, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire
Assistant U.S. Trustee
Suite 970, Liberty Center
1001 Liberty Avenue
Pittsburgh PA. 15222

Frank Skrajny
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Lauren M. Lamb, Esquire
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/s/Dianne DeFoor
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